

1 KEVIN W. ROBERTS  
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5 Spokane, WA 92201  
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8 Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 CHRISTIAN COX, a married man,  
12 and PACIFIC COAST FIBER  
13 FUELS, LLC, a Washington limited  
14 liability company,

15 Plaintiff,

16 vs.

17 ALLIANT INSURANCE SERVICES,  
18 INC., d/b/a MOLONEY + O'NEILL,  
19 a Delaware corporation; DAN  
20 ROMAIN and JANE DOE ROMAIN,  
21 a marital community; FARMIN  
22 ROTHROCK & PARROTT, INC., a  
23 Washington corporation; and KELLY  
24 EGAN and JANE DOE EGAN, a  
25 marital community,

Defendants.

Case No.: 2:16-cv-00362-SAB

**DECLARATION OF CHAD  
FREEBOURN IN OPPOSITION  
TO DEFENDANTS' MOTION TO  
STAY LITIGATION**

21 I, CHAD FREEBOURN, under penalty of perjury under the laws of the  
22 State of Washington, declare and state as follows:  
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- 24 1. I am over the age of 18 and competent to be a witness herein.  
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1           2.     I am an attorney representing the Plaintiffs in the above-captioned  
2 case and make the statements contained in this declaration on personal knowledge.

3           3.     Attached hereto as "Exhibit A" is a true and correct copy of the  
4 November 1, 2016, letter from Robert A. Dunn sent to Kevin Roberts.

5                     DATED AND SIGNED in Spokane, Washington this 16<sup>th</sup> day of  
6 November, 2016.

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10 CHAD FREEBOURN  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16<sup>TH</sup> day of November, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send notification of such filings to the following:

Robert A. Dunn  
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/s/ CHAD FREEBOURN  
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# EXHIBIT A



Banner Bank Building  
111 North Post, Suite 300  
Spokane, WA 99201  
p 509 455 8711 . f 509 455 8734

*A Professional Service Corporation with Offices in Seattle and Spokane*

RECEIVED

NOV 03 2016

Roberts | Freebourn

November 1, 2016

Kevin Roberts  
Roberts Freebourn PLLC  
313 W. Riverside Ave.  
Spokane, WA 99201

**Re: Cox v. Alliant, et al.**

Dear Attorney Roberts:

This is in response to your letter to Attorney Eric Gillett dated 10/24/2016. In the future, any communication you wish to engage in regarding this litigation should be in writing to me as we now represent all the defendants in the above referenced case.

The substance of your argumentative letter will be addressed in pleadings that are forthcoming.

As for your conclusion that "Mr. Cox will be free to fully compete in order to make a living", you omitted the fact that both of his non-solicitation agreements are for 3 years and both of his non-compete agreements are for 1 year. Alliant fully intends to enforce these valid and binding agreements.

Lastly, there will be no "pre-litigation mediation to take place within three weeks." On your best day that was wishful thinking.

Very truly yours,

DUNN & BLACK, P.S.



ROBERT A. DUNN